

Process for Requesting Approval of Over 40 Acre Opening Size Limitation (or an exception to the maximum opening size created by a revised Forest Plan under the 2012 Rule)

A letter requesting approval of new harvest openings proposed greater than the maximum 40 acre opening size standard (or a new maximum opening size exception in a Forest Plan revised under the 2012 Rule, should:

- Adequately address all 5 items listed in the R1 Supplement to **FSM 2471.1**;
 - Required list (Item #5 – in table format) is necessary;
- Discuss why (i.e. give specifics) you cannot adequately meet project purpose and need with either another alternative or of an “Alternative Dismissed from Detailed Study” that does not exceed the 40-acre limit or an maximum opening exception under a revised Forest Plan under the 2012 Rule.
- Document that the NEPA effects analysis supports the need for exceeding the maximum opening size standard of 40 acres or as revised under the 2012 Planning Rule:
 - Need for larger opening size should be built into NEPA document from the start:
 - Support from appropriate resource areas should be part of NEPA analysis & documentation;
 - Reference pages in the NEPA document where support for specific items in the rationale letter can be found;
 - Rationale without good supporting NEPA documentation **will not be approved**.
- Be well organized, **concise, and focused on items relevant to the opening size issue.**
(Long discussions of things extraneous to the rationale for over 40 acre opening size or a new exception under the 2012 Rule, may make it more difficult to get approval of your request. Species composition is not related to exceeding opening size as an example)
- Include maps clearly illustrating the proposed units that will exceed opening size limitations and their relationship to other proposed harvest areas, as well as their relationship to other relevant features (such as private property and/or high value resources that need protection).
- Follow all timing requirements and other protocols in the manual: i.e. the request must originate from the District Ranger but go through the SO for review and Forest Supervisor signature before it goes to RO. This should go to the Regional Forester with a cc to the Director of RRM and the Regional Silviculturist. Forest Silviculturist provides the review. It has worked well in the past to have the Forest Silviculturist share a timely draft with the Regional Silviculturist, who has been designated to process the request, to avoid iterations of the formal letter to the Regional Forester.

The discussion in the letter should concisely focus on the need for the larger opening patch size relative to the purpose and need of the project. Document you have complied with FS Manual requirements shown above including 60 day public notification. Avoid long discussion of other

items. Use short bullet statements & reference the NEPPA document for everything other than direct discussion of the need for larger opening size.

Possible Rationale for Over 40 Acre Openings

The effects of going over 40 acres or an exception in the 2012 Rule should usually include one or more of the following (as appropriate). In each case, summarize the rationale, and reference the specific NEPA analysis page numbers for that resource analysis:

- With large imminent Insect and Disease problems, match the scale of the treatment to the scale of the problem. Center the opening on the large I & D problem areas. Scattered small treatments in large landscapes with widely distributed imminent I & D hazards are not likely to be effective at the landscape scale.
- Less road building and maintenance due to concentration of larger units in roaded area; fewer road miles mean less impact on watersheds and wildlife security.
- Less sediment produced due to fewer roads (fish and water quality benefit) over alternatives that have smaller, dispersed units and more road.
- Larger patch size in the long run to provide better security for wildlife (250 ac size patches of hiding cover for Elk as an example on some Forests)
- Better long-term interior habitat for wildlife species that need it. Be specific as to species & requirements & reference NEPA analysis;
- Better Visual Quality due to units scaled with larger topographic features rather than small artificial blocks.
- If a weather event or insect or disease problem produced widespread large areas with elevated hazardous fuels, need to match the scale of the treatment to the scale of the hazard.
- With large scale fire risks, a landscape scale fuels management strategy with larger units may provide more effective barriers to interrupt crown fire spread across the landscape:
 - This should be supported by project-specific analysis and/or modeling of some sort, or reference to such analysis in a near-by similar area. (*If using modeling from a similar nearby area that should be built into the NEPA analysis*).
- Fuels modifications designed to protect adjacent important old growth stands or critical wildlife habitat areas may need larger openings to be effective.
- Fuels modification coordinated with other ownership treatments, or to protect layout of private property and structures may be beneficial.